

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

In re:) Chapter 11
)
Squirrels Research Labs LLC, <i>et al.</i> ¹) Case No. 21-61491
) (Jointly Administered)
Debtors.)
) Judge Russ Kendig

**DEBTORS' RESPONSE TO MOTIONS OF ENVISTA AND
CINCINNATI INSURANCE COMPANY FOR RELIEF FROM STAY**

Squirrels Research Labs LLC ("Squirrels") and the Midwest Data Company LLC ("Midwest") (each a "Debtor" and collectively, the "Debtors"), file this response and objection (the "Objection") to Envista Forensics, LLC d/b/a AREPA ("Envista") motion for relief from the automatic stay [Docket No. 110] (the "Envista Motion") and the motion of Cincinnati Insurance Company ("Cincinnati," and together with Envista, the "Movants") for relief from the automatic stay [Docket No. 114] (the "Cincinnati Motion," and together with the Envista Motion, the "Relief Motions")

In response to the Relief Motions, the Debtors have no objection to the Court granting limited relief from stay for the purpose of permitting Cincinnati Insurance Company to pay Envista's claim and agree to relief from the automatic stay for that limited purpose, as set forth on the proposed agreed order attached hereto as Exhibit A. To the extent the Relief Motions seek relief or findings beyond permitting Envista to have its claim paid, the Debtors object to that relief and request a hearing with respect to same.

¹ The Debtors in these Chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: Squirrels Research Labs LLC (9310), case no. 21-61491 and the Midwest Data Company LLC (1213), case no. 21-61492.

Dated: February 2, 2022

Respectfully submitted,

/s/ Julie K. Zurn

Marc B. Merklin (0018195)
Julie K. Zurn (0066391)
BROUSE McDOWELL, LPA
388 S. Main Street, Suite 500
Akron, Ohio 44311
Telephone: (330) 535-5711
Facsimile: (330) 253-8601
mmerklin@brouse.com
jzurn@brouse.com

*Counsel for the Debtors
and Debtors-in-Possession*

CERTIFICATE OF SERVICE

I, Julie K. Zurn, hereby certify that on February 2, 2022, a true and correct copy of this Objection was served via the court's Electronic Case Filing System on these entities and individuals who are listed on the court's Electronic Mail Notice List:

- **John C. Cannizzaro** John.Cannizzaro@icemiller.com, lauren.prohaska@icemiller.com
- **Christopher Paul Combest** christopher.combest@quarles.com
- **John G. Farnan** jfarnan@westonhurd.com
- **Robert E. Goff** rgoff@westonhurd.com, jroberts@westonhurd.com
- **Jeannie Kim** JeKim@sheppardmullin.com, dgatmen@sheppardmullin.com
- **Marc Merklin** mmerklin@brouse.com, tpalcic@brouse.com;mmiller@brouse.com
- **David M. Neumann** dneumann@meyersroman.com, jray@meyersroman.com;mnnowak@meyersroman.com
- **Christopher Niekamp** cniekamp@bdblaw.com
- **Paul J. Schumacher** pschumacher@dmclaw.com, tgross@dmclaw.com
- **Frederic P. Schwieg** fschwieg@schwieglaw.com
- **Frederic P. Schwieg** fschwieg@schwieglaw.com
- **United States Trustee** (Registered address)@usdoj.gov
- **Joshua Ryan Vaughan** jvaughan@amer-collect.com, SAllman@AMER-COLLECT.COM;HouliECF@aol.com
- **Julie K. Zurn** jzurn@brouse.com, tpalcic@brouse.com
- **Kate M. Bradley ust44** kate.m.bradley@usdoj.gov

And via regular U.S. Mail on February 2, 2022:

Jason R. Schendel
Sheppard, Mullin, Richter & Hampton LLP
Four Embarcadero Center
Seventeenth Floor
San Francisco, CA 94111

/s/ Julie K. Zurn
Julie K. Zurn (0066391)
BROUSE McDOWELL, LPA
388 S. Main Street, Suite 500
Akron, Ohio 44311
Telephone: (330) 535-5711
jzurn@brouse.com